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BEFORE THE
PUBLIC UTILITIES COMMISSION
AND THE ENERGY RESOURCES CONSERVATION
AND DEVELOPMENT COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emission Standards into Procurement Policies.	Rulemaking 06-04-009 (Filed April 13, 2006)
Order Instituting Informational Proceeding – AB 32.	CEC Docket No. 07-OIIP-01

SOUTHERN CALIFORNIA PUBLIC POWER AUTHORITY COMMENT ON PROPOSED DECISION ON REPORTING AND TRACKING OF GREENHOUSE GAS EMISSIONS IN THE ELECTRICITY SECTOR

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Dated: August 24, 2007

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In accordance with Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission ("CPUC"), the Southern California Public Power Authority respectfully submits this comment on the Proposed Decision ("PD") of Commissioner Michael R. Peevey mailed on August 15, 2007 in the captioned proceedings.

SCPPA recommends that the anti "contract shuffling" provisions in sections 3.3 and 3.4 of the Proposed Electric Sector Greenhouse Gas Reporting and Tracking Protocol ("Reporting Protocol") that is attached to the PD be modified to eliminate the provisions that would require an attribution of emissions based on default emission factors for purchases from existing renewable resources. Likewise, SCPPA recommends that the anti "contract shuffling" provision of sections 3.8 and 3.9 of the Reporting Protocol be modified. The requirement that reports shall be based upon a reporting entity's "ownership share" of a power plant in sections 3.8 and 3.9 as

opposed to actual energy delivered from the power plant should be revised. Retail provider reports will be more accurate if the reports are based on actual energy delivered.

In the alternative, if the Commissions decline to adopt SCPPA's proposed revisions to sections 3.3, 3.4, 3.8, and 3.9 and retain the anti "contract shuffling" provisions, the Reporting Protocol should be revised to provide that those provisions shall be eliminated if the first-seller approach is adopted and the load-based approach is rejected. If retail providers are not the point of regulation in the electric sector, the anti "contract shuffling" provisions would not affect the allocation of allowances and, consequently would have no effect as retail provider behavior. If they continued in effect, the provisions would do nothing more than distract retail provider reports.

Lastly, SCPPA recommends that the default factor that would be adopted in the PD for reporting deliveries from unspecified sources in the Pacific Northwest ("PNW") be modified to provide for a default factor that reflects the fact that exports from BC Hydro are, in part, coal-based.

I. THE ANTI "CONTRACT SHUFFLING" PROVISIONS OF THE REPORTING PROTOCOL SHOULD BE DELETED.

The Reporting Protocol that would be adopted by the PD contains two measures that are intended to prevent "contract shuffling." First, the Reporting Protocol would "attribute emissions associated with any purchases through new contracts with existing specified sources based on the default emission factor of the region in which the specified source is located." PD at 18. The purpose of this measure would be to deter new (post January 1, 2008) contracts with existing low GHG emission facilities. Such contracts would not result in actual emission reductions that would be "seen by the atmosphere." This anti "contract shuffling" measure is set forth in sections 3.3 and 3.4 of the Reporting Protocol.

Second, the Commissions "recommend that the ARB attribute emissions to generation from owned power plants based on the ownership share of the reporting entity unless the retail provider demonstrates that (a) its proportional ownership share of the plant's output could not be delivered to the retail provider during the hours in which it was sold, or that (b) the retail provider did not need the power." PD at 17. If a retail provider could not demonstrate that its proportional ownership share could not be delivered or that the retail provider did not need the power, the California Air Resources Board ("CARB") would attribute emissions to the retail provider's sales using a default emission factor "based on the average emission factor of the retail provider's sources that are available for unspecified sales" to the extent to which the sale "exceeds 10% of the retail provider's proportional ownership share of the generation…." *Ibid*. The provisions of the Reporting Protocol that would require reports on the basis of ownership share are set forth in sections 3.8 and 3.9 of the Reporting Protocol.

SCPPA recommends that the Commissions reconsider whether these anti "contract shuffling" provisions should be recommended to the CARB. The provisions lack factual support and they are contrary to public policy objectives. If, nevertheless, the Commissions decide to propose the anti "contract shuffling" measures to the CARB, SCPPA recommends that the measures be eliminated from the Reporting Protocol if first-sellers rather than retail providers are made the point of regulation in the electric sector.

A. The Anti "Contract Shuffling" Provisions are Unsupported by Fact.

The PD is devoid of any factual support for adopting the anti "contract shuffling" provisions. The PD recites that in the June 12, 2007 Joint California Public Utilities Commission and California Energy Commission Staff Proposal for an Electricity Provider GHG Reporting Protocol ("Staff Proposal"), the joint staffs of the CPUC and CEC opined that there is sufficient low-GHG generation available outside of California such that California retail

providers could meet AB 32 GHG reduction targets through "contract shuffling" without any actual reductions of GHG emissions:

> Staff reports that there is sufficient relatively low-GHG generation (including from natural gas-fired plants) available outside of California such that, if such contractual power swap arrangements were treated as reducing the California retail provider's GHG emissions, California retail providers could be deemed to largely meet the statutory GHG reduction targets but with no reductions in the total GHG emissions due to electricity generation in the Western Electricity Coordinating Council ("WECC").

PD at 12. However, the fact that there is enough low-GHG emission generation in the West for California retail providers to meet their AB 32 goals is, in itself, irrelevant. The existence of the low-GHG resources in the West would be relevant only if there were some meaningful opportunity for California retail providers to obtain contracts that would permit them to replace their high-GHG resources with the low-GHG resources.

Such a resource realignment might be conceivable if it could be realistically assumed that other western states would be happy to host high-GHG emission resources with the low-GHG emission resources being dedicated to California. However, the chances of that happening are low. Other states in the West are making it clear that they share California's concerns about GHG emissions and intend to claim the low-GHG resources that are located in their states as their own. For example, the Oregon Public Utility Commission and Oregon Department of Energy ("Oregon") and the Department of Community, Trade and Economic Development of the State of Washington ("Washington") objected to the joint staffs' attempt to set a default factor for California unspecified purchases from the PNW that would effectively claim PNW non-firm hydro-electric energy for California. *See* Oregon and Washington letters, R.06-04-009 (July 10, 2007). The awareness of other states about GHG emission issues is also exemplified by the fact

that five other states – Arizona, New Mexico, Oregon, Utah, and Washington – have joined California in the Western Regional Climate Action Initiative ("WRCAI").

Even if individual owners of low-GHG resources in other western states could be tempted by California retail providers to enter into contractual relationships that would result in the low-GHG resources of the West being dedicated to California, it is highly unlikely that the governmental authorities in the other states would acquiesce in the resulting "contract shuffling." There is no factual evidence in the PD, the Staff proposal, or anywhere else that "contract shuffling" would actually occur to a significant extent, let alone on a scale that would permit California retail providers to meet their AB 32 goals without actually reducing emissions.

B. Anti "Contract Shuffling" Provisions Would be Inconsistent with the Objective of Obtaining Accurate Reports of GHG Emissions Associated with Electricity Consumed in the State.

The California Legislature clearly intended that the Commissions and CARB should generate reporting protocols that would result in an *accurate* reporting of GHG emissions associated with electricity consumed in California. The Legislature commanded that on or before January 1, 2008, the CARB shall adopt regulations that shall "account for greenhouse gas emissions from all electricity consumed in the state…." California Health and Safety Code §38530(b)(2). The clear implication is that the accounting should be accurate.

Accordingly, the Staff Proposal recognized that the first criterion by which a reporting methodology should be measured is "accuracy." Section 2.3.1 of the Staff Proposal provided: "To the extent possible, the reporting protocol should be designed to produce an accurate estimate of the GHG emissions that result from the consumption of electricity in California, at both the retail provider level and the statewide total." Staff Proposal at 6-7.

In contrast to the Staff Proposal, neither the PD nor the Reporting Protocol provides that accuracy should be a primary criterion. There is good reason for the omission. The anti

"contract shuffling" provisions would result in *inaccurate* reports of GHG emissions associated with electricity consumed in California.

The anti "contract shuffling" provisions would result in artificially high emissions being reported by retail providers. The requirement that a default factor be used to determine the emissions associated with deliveries of energy from existing (pre January 1, 2008) low-GHG resources under sections 3.3 and 3.4 of the Reporting Protocol would result in retail providers reporting emissions higher than those actually associated with generation at the existing resource. Likewise, attributing emissions to sales from an "owned" power plant as would occur under sections 3.8 and 3.9 would result in reported emissions being higher than those associated with the generation that was actually delivered to serve California retail providers. In the interest of meeting the objective of combating "contract shuffling," the Reporting Protocol that would be adopted by the PD would fail to achieve the policy objective of having accurate reports of the GHG emissions associated with electricity consumed in California.

C. The Anti "Contract Shuffling" Provisions Contradict California's Policy of Promoting Renewable Resources.

California has a policy of supporting renewable resources. That policy is most obviously evidenced by the State's adoption of a renewable portfolio standard for California utilities. The policy is also evidenced by the fact that there is no prohibition against contract shuffling in AB 32. Contract shuffling is not even mentioned.

The failure to mention "contract shuffling" in AB 32 is consistent with the Legislature's interest in promoting renewable resources. If retail providers were prevented by rules such as those proposed in the Reporting Protocol from contracting with owners of low emission resources to substitute low emission electricity for high emission electricity, the commercial value of renewable resources would be diminished. Diminishing the value of renewable

resources by reducing the pool of prospective customers for the output from renewable projects would be inconsistent with California's policy of encouraging the development of renewable resources. As observed by the Los Angeles Department of Water and Power ("LADWP") in its opening comment on the Staff Proposal, applying a default emission factor to deliveries of energy from existing renewable resources "would place certain renewable energy projects at a disadvantage in the marketplace." LADWP Opening Comment at 13 (July 2, 2007).

The Staff Proposal cautioned against adopting rules that would have "unintended consequences." Staff Proposal at 7 ("The reporting method should not distort the electricity markets by causing retail providers to make non-optimal resource choices.") That caution against adopting methodologies that would have unintended consequences has been omitted from the Reporting Protocol that would be adopted by the PD. Nevertheless, the caution against unintended consequences that was included in the Staff Proposal should be heeded.

D. A Better Solution for "Contract Shuffling" Would be West-Wide Adoption of GHG Emission Regulations.

A better solution for "contract shuffling" would be west-wide adoption of GHG regulation of retail providers. If all or most of the western states adopted load-based regulation of retail electricity providers as proposed by the CPUC in D.06-02-032 (February 16, 2006) and as contemplated by the Legislature in AB 32, retail providers throughout the West would be focused upon reducing GHG emissions. That would sharply reduce or eliminate any interest that retail providers in other western states might have in participating in "contract shuffles" with California retail providers. Rather than attempt to impose potentially counter-productive anti "contract shuffling" reporting protocols, the better course would be for California to adopt a load-based program for regulation of GHG emissions associated with electricity consumed in California so that the program could promptly be emulated in other western states.

E. If the Anti "Contract Shuffling" Provisions are not Eliminated Now From the Reporting Protocol, the Provisions Should Be Deleted Later if the Load-Based Approach is not Adopted.

If the anti "contract shuffling" measures are allowed to remain in the Reporting Protocol that would be adopted by the PD, the provisions should sunset or otherwise be eliminated from the Reporting Protocol upon if the load-based approach is not adopted. The anti "contract shuffling" provisions would be effective only if retail providers are the point of regulation. If retail providers are the point of regulation and they "shuffled" their contracts, the anti "contract shuffling" measures would cause them to report higher emissions and need more allowances. If retail providers are not the point the regulation, the anti "contract shuffling" provisions in the reporting protocol would result in nothing more than causing contract shufflers to report higher than actual GHG emissions. Insofar as contract shuffling retail providers would not be a point of regulation, the requirement that they report higher than actually experienced emissions would not cause them to need more allowances or to otherwise be penalized for engaging in contract shuffling.

II. THE DEFAULT FACTOR FOR THE PACIFIC NORTHWEST INCORRECTLY REFLECTS BC HYDRO DELIVERIES AS BEING ENTIRELY HYDRO ELECTRIC IN ORIGIN.

The Staff Proposal presented a default factor of 419 lbs. CO_2/MWh for the PNW. The proposed default factor was criticized by Oregon, Washington, and others (including SCPPA) as failing to reflect the fact that the PNW states claim non-firm hydro electric resources for service to their native load. If California claimed such resources by reflecting them in a California default value for imports from the PNW, the result would be that both California and the PNW states would be claiming non-firm hydro electric resources. That would result in double counting.

In the PD, the Commissions "agree that Staff did not account adequately for the amount of coal used by marketers that sell power to California retail providers." PD at 31. The Commissions modify the Staff's methodology "to attribute a default emission factor 1,062 lbs. CO_2/MWh for imports from northwest utilities, excluding British Columbia hydro." *Ibid.* That is a big step in the right direction.

However, the PD assumes that "23 percent of California's unspecified imports come from British Columbia hydro-electric sources." *Ibid*. As a result, when British Columbia's hydro is included with deliveries from the PNW state utilities, the PNW default emission factor drops from 1,062 lbs. CO_2/MWh to 714 lbs. CO_2/MWh. *Ibid*.

It is incorrect to assume that all power flowing from British Columbia is hydro-electric in origin. BC Hydro purchases power from Alberta. Alberta's resource mix, in turn is overwhelmingly coal-based. The BC Hydro Integrated Electric Plan ("IEP") shows that that BC imports approximately 8 million MWh hours per year.
http://www.bchydro.com/info/epi/epi43498.html

California Energy Commission data shows that British Columbia exports approximately 4 million MWh hours per year. Given British Columbia's substantial imports from Alberta, it follows that the exports from British Columbia are a subset of British Columbia's imports. Thus, there is a significant likelihood that British Columbia exports to California are enabled by British Columbia imports from Alberta, which are mostly coal-based.

The 1,062 lbs. CO_2/MWh that would be adopted by the PD should be applied to unspecified imports from the PNW for the period starting 1990 to present until actual monthly modeling can be done to show what the actual marginal resources have been in the PNW during periods of exports to California.

Using the 1,062 lbs. CO_2/MWh as a proxy has several advantages. First, it is more accurate than 714 lbs. CO_2/MWh. Second, a PNW default factor of 1,062 lbs. CO_2/MWh is very close to the value for unspecified imports from the southwest, 1.075 lbs. CO_2/MWh. Thus, adopting the 1,062 lbs. CO_2/MWh default factor for the PNW would eliminate any incentive to "shuffle" power that is acquired in the southwest by shipping the power to the PNW for delivery into California.

Given that the PD's proposed PNW default factor of 714 lbs. CO_2/MWh is based on a clearly erroneous assumption that 100 percent of the imports from British Columbia are hydro-based, SCPPA recommends that the PD be revised to adopt a default factor of 1,062 lbs. CO_2/MWh until further modeling can be performed.

III. CONCLUSION.

For the reasons set forth above, SCPPA recommends that the provisions in sections 3.3, 3.4, 3.8, and 3.9 of the Reporting Protocol be revised to eliminate the anti "contract shuffling" provisions. As a less preferable alternative, SCPPA recommends that the Reporting Protocol be revised to provide that the anti "contract shuffling" provisions shall be deleted from the Reporting Protocol if the load-based approach is not adopted. Additionally, SCPPA recommends that an interim default factor 1,062 lbs. CO_2/MWh be adopted for the PNW rather than 714 lbs. CO_2/MWh.

In accordance with Administrative Law Judge TerKeurst's instructions which were e-mailed on August 23, 2007, Attachment A hereto shows SCPPA's preferred revisions to the Reporting Protocol that was attached to the PD.

Respectfully submitted,

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Dated: August 24, 2007

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the **SOUTHERN CALIFORNIA PUBLIC POWER AUTHORITY COMMENT ON PROPOSED DECISION ON REPORTING AND TRACKING OF GREENHOUSE GAS EMISSIONS IN THE ELECTRICITY SECTOR** on the service list for CPUC Docket No. R.06-04-009 and CEC Docket No. 07-OIIP-01 by serving a copy to each party by electronic mail and/or by mailing a properly addressed copy by first-class mail with postage prepaid.

Executed on August 24, 2007, at Los Angeles, California.

/s/ Sylvia Cantos

Sylvia Cantos

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